BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE GOVERNMENT CFFICE OF THE SEGRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS-183-214)

The United States Postal Service hereby moves for late acceptance of the responses to OCA/USPS-183-214, filed today. These responses were due to be filed November 14, five calendar days ago. The responses required obtaining material and information from a number of people, most of whom were on travel or not easily accessible. Moreover, none of this material is related to the Postal Service's direct case in this proceeding. The Postal Service regrets the delay, but offers that no party has been prejudiced by it.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Nan K. McKenzie

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268-3089 Fax –5402 December 3, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Nan K. McKenzie

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 December 3, 2001